

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-4 For the years 2000 through 2005 inclusive, please supply by work area:

- a) The number of line/construction (not repair or installation) crews assigned to New Hampshire at the beginning of the year
- b) The percentage of their time budgeted to New Hampshire
- c) The percentage of their time charged to New Hampshire at year end.

**REPLY:** The number of Verizon New Hampshire (Verizon NH) line construction crews across New Hampshire fluctuates throughout the year and may be supplemented from other areas as service demands shift. The table below depicts the line force in place at the beginning of each year.

Information responsive to the request for information to be provided by “work area” is not maintained in the ordinary course of business, and thus is not available.

*New Hampshire*

YEAR	Line Force	% time Budgeted to NH	% time Charged to NH YE
2000	90	100%	100%
2001	92	100%	100%
2002	80	100%	100%
2003	80	100%	100%
2004	74	100%	100%
2005	70	100%	100%

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-6 Do your individual pole setting objectives (response to Staff 1-34) include loading the pole and travel time?

**REPLY:** Yes, the pole setting objectives identified in Verizon NH's response to Staff 1-34 include, among other things, loading the pole and travel time.

VZ #87

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering  
**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-8 What can you do to reduce the long lead times required to set poles in your maintenance areas?

**REPLY:** Verizon NH does not agree with the assumption that "long lead times" occur in setting poles in its maintenance area. See Verizon NH responses to Staff 1-32, 1-36, and 1-37.

Verizon NH manages the construction process to ensure pole setting lead times are kept to a minimum. This involves compliance with the work scheduling process; regular monitoring of work progress through monthly estimate status meetings for larger projects and daily intervention by the Construction Control Center for smaller jobs; and adjusting force levels as required, all in order to meet the required construction completion dates.

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-9 For the years 2000 through 2005 inclusive, has any entity on which you depend to set poles for what you would consider normal work, delayed your requested installation schedules? If so, please list each occurrence by year and the duration of each delay.

**REPLY:** Information responsive to the request is not maintained in the ordinary course of business, and thus is not available.

VZ #90

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-11 Please supply your policy regarding the lashing of your facilities to other facilities owned by you and other facilities owned by others to maintain National Electrical Safety Code clearance requirements.

**REPLY:** Verizon NH does not lash its facilities to facilities owned by others.

Verizon NH's current practice allows lashing a new Verizon NH cable to an existing Verizon NH cable that is itself lashed to an existing 6M or larger suspension strand in good condition. This practice is referred to as "over lashing." Several factors must be taken into account when considering whether to over lash.

1. Pole class
2. Joint owned/used pole line
3. Storm loading areas (NE is considered "heavy")
4. Electric company conductor and attachment load
5. Height of pole
6. Guying corners - lead/height ratio
7. Size/strength of guys and anchors
8. Span length
9. Strand tension (shall not exceed 60% of breaking strength under storm conditions)
10. Existing sag (shall not exceed 10' at 60 degrees, with no wind)
11. Existing cable load on the strand being considered for over lashing
12. Incremental weight of the cable proposed for over lashing
13. Effect of additional cable weight on sag and ground/road clearances

**REPLY: (Cont'd)**

14. Maintaining adequate separation from other utilities' attachments
15. Multiple Verizon NH strand/through-bolt attachments at pole

Restrictions include

1. Do not over lash any cable to pitted or deteriorated support strands
2. Do not over lash any size or type cable to support strands less than 6.6 meters
3. Do not over lash fiber optic cable to pole lines with excessive sag
4. Do not over lash fiber optic cables to strands holding a lead sheath cable
5. Do not lash a copper cable to an existing self-support cable.

VZ #92

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-13 Does the 60-day clock described in the question above start when the electric company has transferred and sent you notice, or does it start when all of the licensees have completed transfers?

**REPLY:** In the Joint Ownership agreement between Verizon NH and PSNH, IOP #10, Item 1(b), states that the maintaining party is responsible to notify the co-owner when a pole is ready to be transferred and that a pole will be considered ready to transfer when the attachments to be moved are free from obstruction from any foreign cable, wire or appurtenances. Item 1(c), of IOP #10, states that upon receipt of the transfer notification each company is responsible for transferring its facilities within 60 days. As the transfer notice should not be sent to Verizon NH prior to all obstructions having been removed from the pole, the 60-day clock would not begin until the removal of all attachee's facilities and the subsequent receipt of a valid transfer notice.

VZ #94

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-14 Do you find that few, many or most pole replacements present the need to notify licensees to transfer at the time Verizon is ready to transfer? Please support your answer with any data or studies.

**REPLY:** Information responsive to the request is not maintained in the ordinary course of business, and thus is not available.

In general, however, most pole replacements have third party attachments, which require notifications for transfers of their plant. Each party should be held responsible for notifying the next licensee to transfer until Verizon NH is notified to transfer and, if responsible, remove the pole.

In addition, the electric companies need to take ownership of the process of notifying and ensuring that all third parties are transferred prior to notifying Verizon NH to transfer and remove the pole. The present process negatively impacts the 60 day window, which applies only between Verizon NH and PSNH, as Verizon NH has, by default, become the coordinator for transfers, because all attachees are being notified at the same time. If Verizon NH did not take this responsibility, the number of poles awaiting transfers would significantly increase. This is especially true in the urban areas where the number of attachees on the pole is greater than in rural areas.

VZ #95



**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:  
Title:**

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-17 Do you notify licensees that poles are ready to transfer or do you rely on Verizon to do so?

**REPLY:** Verizon response not required.

VZ #98

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-18 Are you satisfied with your current transfer notification process or can it be improved? Do you think it would be beneficial to establish an electronic transfer notification database shared between pole owners and licensees?

**REPLY:** Currently there is not a uniform process in place for transfer notifications between the utilities and/or licensees. The current system relies on faxes, phone calls, field look-ups and e-mail. The consistency of notification varies between companies and departments within those companies. Verizon NH has recently moved to an electronic version of the Exchange of Notice memorandum with PSNH. This system is a vast improvement over the prior process. Setting up a similar notification system for transfer work would offer benefits to all pole attachees.

VZ #99

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-20 Verizon had an agreement with the NHPUC Staff where it agreed to remove 400 more poles from its system backlog than the number of new poles set on its system including replacements and new construction. For each year beginning with the first year of the agreement through 2005 inclusive, please supply the total number of new poles set for all reasons and the number of poles removed. If in any year, the number of poles removed does not meet the 400 more than installed requirement, please explain why the agreement was not met. As part of your response, please include any efforts in the following year to “make up the difference”.

**REPLY:** Listed below is the data requested since the beginning of the agreement. In four of the nine years Verizon NH met or exceeded the objective of a net (400) reduction in poles set. In three of the years Verizon NH had a positive net removal, but did not reach the 400 target. In two of the years Verizon NH set more poles than removed. Overall Verizon NH removed more poles than set (1,013).

From 1997 through 2004 there was a significant increase in Verizon NH's pole setting program due to new construction requests. This resulted in more poles in the field with fewer opportunities for removal. This increase, coupled with large New Hampshire Department of Transportation (DOT) projects that usually run for three year periods, along with large municipal projects that fit the same scenario and poles to be removed awaiting third party licensees to transfer, limited the opportunities for removal and adversely affected the net number.

**REPLY: (Cont'd)**

<b>Year</b>	<b>Poles Placed</b>	<b>Poles Removed</b>	<b>NET</b>
1996	2794	3527	( 733)
1997	3779	4243	( 464 )
1998	4069	3951	118
1999	4166	4743	( 577 )
2000	4077	4229	( 152 )
2001	Data not avail.	system	change over
2002	3703	4254	( 551 )
2003	3602	2896	706
2004	3577	3718	( 141 )
2005	2809	2028	781
TOTAL	32,576	33,589	( 1013 )

VZ #101

**Verizon New England Inc.  
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**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-21 For the years 2000 through 2005 inclusive, please list all the public works jobs where poles were not removed, set, or moved in the time frame originally requested. As part of your response state how late the requested work was and the reason for the delay.

**REPLY:** Information responsive to the request is not maintained in the ordinary course of business, and thus is not available.

In general, however, public works jobs that involve pole work do not have static time frames placed on the pole related activity. The due dates on these jobs are dynamic in nature and priorities can shift between various jobs. Verizon NH makes every effort to accommodate the original due dates and any subsequent changes to those due dates.

VZ #102

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-22 Please supply a copy of your policy of discarding old poles that have been removed from service. If you consider the old pole an environmental hazard requiring specific disposal techniques, please indicate whether your company has, does, or will, cut an old pole (T or D) at the ground line to facilitate economic removal of the pole.

**REPLY:** Verizon NH treats poles to be discarded as hazardous material. All poles removed are brought back to the garage and stored in a pole bin, where they are picked up and disposed of by a licensed hazardous material company. Verizon NH does not cut poles at ground level to facilitate the removal process. The entire pole is removed.

VZ #103

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-23 Reference your response to Staff 1-15: Please identify the subset of poles that are pending Verizon NH transfers within Verizon's maintenance area. How many of these transfers have been pending in excess of 60 days? 90 days? 180 days? One year? Two years?

**REPLY:** The information below identifies poles where Verizon NH has pending transfer activity. The data, however, do not imply that these locations are ready for Verizon NH to transfer.

	Category	Total
Verizon Set Area	1 Under 60 Days	219
	2 Between 60 and 90 days	110
	3 Between 90 and 180 days	445
	4 Between 180 and 1 yr	560
	5 Between 1 yr and 2 yrs	499
	6 Over 2 yrs	1,280
Sub-Total		3,113
Electric Set Area	1 Under 60 Days	375
	2 Between 60 and 90 days	77
	3 Between 90 and 180 days	117
	4 Between 180 and 1 yr	220
	5 Between 1 yr and 2 yrs	439
	6 Over 2 yrs	1,138
Sub-Total		2,366
Grand Total		5,479

**Verizon New England Inc.  
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**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-24 Reference your response to Staff 1-15: Please identify the subset of poles that are pending Verizon NH transfers within maintenance areas other than your own. How many of these transfers have been pending in excess of 60 days? 90 days? 180 days? One year? Two years?

**REPLY:** Please see response to Staff 3-23

VZ #105



**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-25 Have any serious discussions occurred between Verizon and the electric companies concerning maintenance trimming responsibilities in the joint operating practices and the need to change those agreements to reflect individual company trimming policy?

**REPLY:** Verizon NH has discussed maintenance trim responsibilities and procedures with Unitil and PSNH. The procedural discussions included how to employ the notification process to ensure both companies participate in joint trimming when applicable, acquisition of and response to maintenance trim list, the need to ensure there is accuracy in the invoicing, and the need for proper back-up documentation to support trim charges.

The majority of the joint trimming agreements between Verizon NH and the power companies provide that either company can participate or refuse participation in joint trimming if it does or does not feel there will be a benefit to maintenance trimming. No need exists to change the wording of the trim agreement as it is designed to allow for participation or not based on the maintenance trimming needs of each company.

VZ #106

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-26 For the years 2000 through 2005 inclusive, please supply;

- a) The number of requests for approval of danger tree removal
- b) The average time it took to approve the request (date of receipt to approval transmittal date)
- c) The number of requests for shared payment of danger tree removal received
- d) The average payment time from (date of receipt from payment request to check transmittal date)

**REPLY:** Information responsive to the request is not maintained in the ordinary course of business, and thus is not available.

VZ #107

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-27 Does your company have a maintenance trimming program, including standards, policies, criteria for maintaining line clearances, controlling vegetation and tree contact? If yes, please provide a copy. If no, please explain why your company does not have such a program.

**REPLY:** Verizon NH does not employ a cyclical maintenance trimming program in the same manner as the power companies due to the difference in the reaction of our facilities to the proximity of foliage. The physical properties and low voltage characteristics of telephone facilities are quite different from facilities associated with the distribution of high voltage electric current.

Verizon NH reviews the cyclical maintenance trim lists provided by the power companies. Field reviews are done to determine if there would be a benefit to participate in joint trim in the event there is heavy tree growth which has encroached on our facilities or has prevented access to our distribution terminals. Verizon NH also accepts joint trimming associated with a “hot spot” or a “hazard” tree resting on a Verizon NH cable.

VZ #108

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-28 Please provide a summary by year, for each of the past 5 years, of your expenditures for maintenance tree trimming (i.e., trimming not associated with additions, extensions, overlashing, construction or reconstruction). Please include in this summary the number of miles trimmed in each year.

**REPLY:** Information responsive to the request is not maintained in the ordinary course of business, and thus is not available.

VZ #109

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-29 When performing trimming of joint lines, what standards or specifications are used for line clearances? (In other words, how much is cut?)

**REPLY:** When it is agreed that Verizon NH and the power company are in need of trimming, whether maintenance or new construction, and both companies are in agreement there would be a benefit from participation in joint trimming, the standards followed are as defined in the Intercompany Operating Procedures (IOPs) relative to tree trimming.

Generally, maintenance and construction trimming require that foliage be trimmed seven to eight feet from the centerline of the pole away from the road and as far as necessary towards the road limits until the clearing for the roadway is met. Poles in a “right-of-way,” also referred to “off-road,” are typically trimmed seven to eight feet each side of the centerline of the pole line. The particular distances, however, would be subject to the specific provisions in trimming IOPs that Verizon NH has with various power companies.

VZ #110

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-30 Does your company perform maintenance trimming of service lines to customer homes? If a customer calls requesting that its service line be trimmed, what is your response?

**REPLY:** Verizon NH will trim or place special tree protection on wires in the right of way as needed. Verizon NH, however, does not dispatch technicians for the sole purpose of performing maintenance trimming on private property. If a customer is having telephone service interruptions, or outages, a repair technician will be dispatched. In the course of the repair visit, a technician will inspect the condition of the aerial service wire. If the technician observes a branch or branches that are causing or could cause physical damage to the insulation or conductors of that aerial service wire then the technician may, with the property owner's permission, prune back the errant branch to avoid ongoing service wire damage.

VZ #111

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-32 Is the cost of trimming associated with the FTTP program considered by Verizon to be “maintenance” or “construction” trimming?

**REPLY:** The cost of trimming associated with deployment of FTTP is attributed to construction.

VZ #113

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-33 How does Verizon determine whether to participate financially in maintenance trimming on joint pole lines? Please list all criteria which must be met in order for Verizon to agree to divide the cost of maintenance trimming undertaken by an electric utility on jointly owned lines.

**REPLY:** Verizon NH uses the following criteria to determine a need for maintenance trimming.

- Density and the number of limbs in the area of the cable or cables
- Potential damage to Verizon NH's facilities
- Immediate and future cable placement needs in the area
- Ability to access Verizon NH's facilities.

VZ #114



**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-34 Please describe your understanding of the need for tree trimming to maintain line clearances in order to protect and maintain the integrity of your own facilities, as well as the facilities of other parties attached to the poles.

**REPLY:** The need for tree trimming associated with Verizon NH's facilities is based on conditions that present a hazard to its aerial plant and not based solely on the proximity of foliage. The vegetation management requirements of the power companies are best addressed by them, due to the different characteristics of electric lines and the higher voltage transmission.

VZ #115

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-36 Does Verizon ever perform maintenance trimming (i.e., trimming not associated with additions, extensions, overlashing, construction or reconstruction) on joint owned lines? If yes, under what circumstances? Is this trimming coordinated with electric companies to maximize benefits and achieve efficiencies?

**REPLY:** Verizon NH coordinates and participates in joint trimming with a power company when it is agreed there is a benefit to Verizon NH's facilities in the locations to be trimmed. Please see response to Staff 3-35. Verizon NH participates in maintenance trimming through the process of reviewing trim lists that are provided by individual power companies on a quarterly, semi-annual or annual basis or when presented with a trim request for a specific power company project.

VZ #117

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Alan Cort  
**Title:** Director - Regulatory

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-37 What is your company's legal liability at a double pole location if an accident occurs involving one or both of the poles in place?

**REPLY:** Verizon NH has joined in the February 15, 2006 objection submitted by Unital relating to this request. The information request seeks a legal conclusion or legal analysis and is thereby objectionable.

VZ #118

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-38 When Verizon is informed by another joint owner to: a) replace a pole in Verizon's maintenance area due to the discovery that the pole was damaged and temporarily made secure by that joint owner; b) replace anchors due to the discovery that the anchors are pulling out or are corroded, resulting in potential sag or low wires; or c) perform a "cut and kick" operation with the other joint owner, how does Verizon ensure that it undertakes the requested work in a timely manner (i.e., within 60 days)? Are there any such requests outstanding in excess of 180 days? One year? Two years?

**REPLY:** These types of request may require an immediate dispatch or can be scheduled based on the urgency of the request and input received from the requestor. If a pole is "made safe," no need exists for an immediate dispatch. "Made safe" indicates there is no danger to the public. Any safety concerns to the public require immediate dispatch to resolve the safety concern. If a situation were made safe, engineering would be notified and a job issued and scheduled, following our scheduling process.

Information responsive to the number of requests outstanding is not maintained in the ordinary course of business, and thus is not available.

VZ #119

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-39 To the extent that the information requested in this request has been supplied in a previous response, please supply a reference. The National Electrical Safety Code requires inspections, record keeping, and timely correction of defects found during inspections. (If you disagree with this interpretation, please supply your interpretation of the National Electrical safety Code and a detailed rebuttal of the position stated herein). For poles, clearances, broken guy wires, slack guy wires, or defective attachment hardware, please supply, by year, for the years 2000 through 2005 inclusive:

- a) The frequency at which these inspections are performed
- b) The percentage of the system inspected and how that percentage is calculated
- c) The priority for replacement given including any time requirements
- d) A copy of the inspection sheet (or screens) used by the inspector
- e) A description of the method on how you track the deficiencies noted and completion progress
- f) The backlogs at year end for each item.

**REPLY:** As stated in Verizon NH's response to Staff 2-25, NESC 214A4 requires recording of defects not promptly corrected. Verizon NH replaces defective poles and pole related hardware found to be hazardous on an immediate basis. Verizon NH's inspection processes thus comply with NESC 214. (See Note under 214.2 "as it is recognized that inspections may be performed in a separate operation or while performing other duties, as desired.")

**REPLY:(Cont'd)**

- a. As Verizon NH described in its reply to Staff 1-12, inspections occur as a normal course of business, without a set schedule.
- b. With respect to the percentage of the system inspected, information responsive to the question is not maintained in the ordinary course of business, and thus is not available.
- c. Verizon replaces defective poles found to be hazardous on an immediate basis. See Verizon NH's Response to Staff 2-25.
- d. No inspection sheet is used. In all cases, the pole is tagged "condemned" in the field. This information is called directly into engineering, an order is written and issued to the field, and the pole is immediately replaced.
- e. As hazardous conditions are corrected immediately, there is no need to track deficiencies, as they do not exist.
- f. Information responsive to the outstanding backlog is not maintained in the ordinary course of business, and thus is not available.

VZ #120

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-40 With regard to Verizon's response to Staff 1-12, please provide the definition of "ongoing and regular" as used in the first sentence of the response. Please describe every method employed by Verizon on an "ongoing and regular basis" to inspect poles other than when a pole is climbed.

**REPLY:** "Ongoing and regular" is the time frame during which Verizon NH field forces perform their daily responsibilities and work operations, and includes weekend work and emergency callout situations.

Additional methods deployed to inspect poles, other than when a pole is to be climbed or worked on, include visual inspections of the pole when new construction work is being designed; inspections of adjacent poles on either side of the pole to be worked on; field engineers and managers identifying hazardous poles in the course of field note-taking and performing quality inspections; and receipt of notice from other utilities and licensees, state and local municipalities, the general public and Verizon Repair Centers.

VZ #121

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-41 Please provide a list of all poles climbed by Verizon technicians in each of the last five years.

**REPLY:** Information responsive to the question is not maintained in the ordinary course of business and thus is not available.

VZ #122



**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-42 If poles have been identified as unsafe and designated “condemned” by the method described in Verizon’s response to Staff 1-12, how does Verizon ensure that the identified unsafe pole has been adequately addressed if, according to Verizon’s response to Staff 1-14, Verizon is unable to identify work orders to replace condemned poles?

**REPLY:** A pole that has been classified as unsafe and condemned is replaced immediately. It does not follow the normal work flow that applies to regularly scheduled work.

Please see Verizon NH’s reply to Staff 3-39 (d).

VZ #123

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-43 Please indicate whether Verizon has, in each of the last five years, and is currently, conducting inspections of all jointly owned poles in each of its maintenance areas in New Hampshire. If not, please indicated for which time periods and/or which maintenance areas it has not conducted or is no longer conducting such inspections.

**REPLY:** Based on its field operations throughout the state, Verizon NH reasonably believes that over a 10 year period the vast majority of the poles in our maintenance area are inspected using routine work practices. However, we do not document the inspections and therefore cannot verify the inspection intervals.

VZ #124

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-44

- a) Is Verizon conducting inspections in its maintenance areas in Unutil's service areas according to the terms of IOP #16 of the Intercompany Operating Procedures between Unutil and Verizon, dated November 1, 1996? If yes, please provide all documentary evidence of such inspections over the past five years.
- b) Are all poles in Verizon's maintenance area of Unutil's service area inspected by Verizon at or before the age of 20 years? Thereafter, are all poles in Verizon's maintenance area in Unutil's service area inspected by Verizon at intervals not to exceed 10 years? How does Verizon ensure that all poles in its maintenance area are inspected in accordance with IOP # 16 and NESC 214A?

**REPLY:**

- a. Please see Verizon NH's response to Staff 3-43.
- b. Please see Verizon NH's response to Staff 3-43. It is Verizon NH's position that the present policy addresses adequately IOP#16 and NESC 214A.

VZ #125

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-45 Please provide all documentary evidence of the frequency of Verizon's inspections of jointly owned poles in Verizon's maintenance areas.

**REPLY:** Information responsive to the question is not maintained in the ordinary course of business and thus is not available.

VZ #126

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-46 Please reference the response provided by Verizon to Staff 1-12:  
Please explain how, simply through its “normal course of business,”  
and without a “set pole inspection schedule,” Verizon is able to ensure  
that all of the jointly owned poles in its maintenance areas are  
inspected at regular intervals.

**REPLY:** Please see Verizon NH’s response to Staff 3-43.

VZ #127

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-47 Please reference the response provided by Verizon to Staff 1-17:  
Please provide copies of all “notices posted by foremen in respective coverage offices” regarding “hazardous pole conditions” in your possession for those garages that support work in Unitil’s service area (seacoast and capital service areas).

**REPLY:** As stated in Staff Set 2-25, hazardous poles are replaced on an immediate basis. The posting of notices thus is not required and has been discontinued.

VZ #128

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director-Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 3

**DATED:** February 7, 2006

**ITEM:** Staff 3-48      Reference your response to Staff 1-23: Is it Verizon's position that the absence from its union contract of provisions concerning the use of qualified third-party contractors to address safety concerns excuses the company from its obligations to address those safety concerns in a timely manner when its internal workforce is insufficient or unable to respond?

**REPLY:** No. Verizon NH addresses all safety concerns in a timely manner with its internal workforce and a contracted workforce when needed.

VZ #129